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INTERNATIONAL MILITARY TRIBUNAL
FOR THE FAR EAST

- 1 -

THE UNITED STATES OF AMERICA, et al

- VS -

ARAKI, Sadao, et al

- Defendants -

REQUEST FOR PRODUCTION OF WITNESSES

NOW COMES UMEZU Yoshijiro and requests the Tribunal, in accordance with Article 9(e) of the Charter, to order the production of the following witnesses necessary to his defense:

1. Lieutenant General HATA Hikozauro (also known as HADA Hikozauro)

- a. The nationality of the witness is Japanese;
- b. The address of the witness is unknown; his last official position was Chief of Staff of the Kwantung Army, and he was last reported as having surrendered to the Russian forces in Manchuria on or about 20 August 1945;
- c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Chief of Staff of the Kwantung Army, of which the defendant UMEZU was Commander-in-Chief;
- d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment, and was not responsible for the planning, initiating or waging of wars of aggression;

- e. The date upon which the attendance of the witness will be required to testify cannot be stated accurately; but his attendance for consultation with counsel is required forthwith;

2. Major General YAMAMOTO Moichiro (known also as YAMAMOTO Shigeichiro)

- a. The nationality of the witness is Japanese.
- b. The address of the witness is unknown; the last official position was Chief of Staff of the 16th Army in Java;
- c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Secretary to the said defendant who was then Vice-Minister of War;
- d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment and was not responsible for the planning, initiating or waging of wars of aggression;
- e. The date upon which the attendance of witness will be required cannot be stated accurately; but his attendance for consultation with counsel is required forthwith;

3. Major General MATSUMURA Tomokatsu.

- a. The nationality of the witness is Japanese;
- b. The last official position of witness was Vice-Chief of Staff of the Kwantung Army and he is now believed to be a prisoner of war of the Russian forces in Manchuria;

- c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Chief of Operations Section of the staff of the Kwantung Army;
- d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment and was not responsible for the planning, initiating or waging of wars of aggression;
- e. The date upon which the attendance of witness will be required cannot be stated accurately; but his attendance for consultation with counsel is required forthwith;

4. Lieutenant General KASAHARA Yukio;

- a. The nationality of the witness is Japanese;
- b. The last official position of witness was commanding general of the 11th Army, and he is believed to be a prisoner of war of the Chinese forces;
- c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Chief of Staff to the Kwantung Army, of which the defendant UMEZU was Commander-in-Chief;
- d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment and was not responsible for the planning, initiating or waging of wars of aggression;

- e. The date upon which the attendance of witness will be required cannot be stated accurately; but his attendance for consultation with counsel is required forthwith;

5. Lieutenant General IIDA Shojiro;

- a. The nationality of the witness is Japanese;
- b. The last official position of witness was commanding general of the 3rd Army, and he is believed to be a prisoner of war of the Russian forces in Manchuria;
- c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Chief of Staff to the Kwantung Army, of which the defendant UMEZU was Commander-in-Chief;
- d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment and was not responsible for the planning, initiating or waging of wars of aggression;
- e. The date upon which the attendance of witness will be required cannot be stated accurately; but his attendance for consultation with counsel is required forthwith.

UMEZU Yoshijiro

by

MIYAKE Shotaro

Ben Bruce Blakeney
Major, AC

His Counsel

Paper No. 297
Disposes of
Paper No. 292

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST
SITTING AT TOKYO, JAPAN

Case No. 1

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| THE UNITED STATES OF AMERICA, et al |) ORDER, |
| - vs - |) (1) GRANTING PROSECUTION |
| |) LEAVE TO FILE APPLICATION |
| ARAKI, Sadao, et al |) (2) GRANTING APPLICATION TO |
| |) WITHDRAW EXHIBITS. |

This matter coming on to be heard before
Mr. Justice Webb, President of the Tribunal, on the
following:

(1) Application of the Prosecution for
leave to file the within application dated the
15 day of July 1946;

(2) Application for leave temporarily to
withdraw certain exhibits dated the 15 day of
July 1946;

and after hearing the arguments of Counsel for the Prosecution
Section and the Counsel for the Defense Section, the Tribunal
being fully advised, it is

ORDERED: (1) That leave is granted to file
the said application, and it is

ORDERED: (2) That application of the Prosecution
for leave temporarily to withdraw certain exhibits be and
the same is hereby GRANTED, and the Clerk of the Court is
hereby authorized to deliver from the Registry of the Tribunal
such exhibits and documents as the Prosecution or the Defense
Section shall require for its use during the course of the
proceedings; and it is further

ORDERED: That the said exhibits shall be delivered
by the Clerk only upon the written receipt of the following:

Prosecution Section
Capt. George C. Salmons
or
Lt. Joe B. Alexander

Defense Section
Lt. Comdr. E. R. Harris, USNR

Dated at Tokyo, Japan, this 16 July 1946.

BY THE TRIBUNAL:

/s/ W. F. Webb
PRESIDENT